

REMARKS

1
2 Claims 1, 8, 15, 21, and 29 are amended to more clearly point out that
3 which is being claimed.
4

5 Claims 3, 10, 16, 22, and 31 are canceled herein without prejudice.
6

7 Claims 1, 2, 4, 5, 8, 9, 11, 12, 15, 21, 23, 25-30, 32, and 33 are pending.
8

Rejections under 35 U.S.C. §103(a)

9 Of the pending claims, Claims 1, 2, 4, 5, 8, 9, 11, 12, 15, 21, 23, 25-30, 32,
10 and 33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over an
11 article by Linda Stuart ("Netware Mobile extends network to off-line users"), in
12 view of an article by Scott Spanbauer ("Happy 2000-or 1900!. Qwerty verses
13 Dvorak. Stop a hard disk from churning."), and in further view of published EP
14 Patent Application No. 01109486.9 published as EP 1,150,207 for inventors
15 Suzuki et al. Applicants respectfully traverse these rejections for at least the
16 following reasons.
17

18 *Nether Stuart, Spanbauer, and/or Suzuki et al.* disclose a method as recited
19 in independent **Claim 1** that includes "assigning each of a plurality of data files to
20 one of a plurality of specific corresponding downloadable file groups, for each
21 downloadable file group, compressing together all assigned data files to form one
22 processed image for the downloadable file group, associating each resulting
23 processed image with a unique identifier derived therefrom, generating a listing of
24 processed image with a unique identifier derived therefrom, generating a listing of
25

1 unique identifiers, storing the processed images and the listing of unique
2 identifiers within a source device, comparing the listing of unique identifiers with
3 a current listing of unique identifiers of a client device, and selectively sending
4 processed images from the source device whose unique identifiers appear in the
5 listing of unique identifiers but not in the current listing of unique identifiers in the
6 client device". More particularly, the cited references fail to disclose or even
7 reasonably suggest "associating each resulting processed image with a unique
8 identifier derived therefrom". This act allows for identifiers that are unique and
9 easily generated, and moreover are also well suited for comparison to other
10 identifiers in determining if an update (e.g., file download) is needed. For at least
11 this reason, the novel software version control method Claim 1 is clearly
12 patentable over the cited art.

14 In **Claim 2**, which depends from Claim 1, the source device is further
15 specified to include at least one server device.

16 **Claim 4**, which depends from Claim 1, further specifies that assigning data
17 files to downloadable file groups includes assigning a plurality of related function
18 data files to one downloadable file group.

20 **Claim 25**, which depends from Clam 1, further recites that the one
21 processed image for the downloadable file group has a ".cim" extension.

22 Independent **Claim 8** is directed towards a computer-readable medium
23 having computer-executable instructions for causing at least one processing unit to
24 perform certain acts. The acts include assigning each of a plurality of data files to

1 one of a plurality of specific corresponding downloadable file groups and for each
2 downloadable file group compressing together all assigned data files to form one
3 processed image for the downloadable file group. Further acts recited include
4 associating each resulting processed image with a unique identifier derived
5 therefrom, generating a listing of unique identifiers, and storing the processed
6 images and the listing of unique identifiers within a source device. Additional acts
7 include comparing the listing of unique identifiers with a current listing of unique
8 identifiers in a client device, and selectively downloading processed images from
9 the source device to the client device whose unique identifiers appear in the listing
10 of unique identifiers but not in the current listing of unique identifiers in the client
11 device.

13 The exemplary arguments stated above with regard to Claim 1 are also
14 applicable to Claim 8.

15 **Claim 9**, which depends from Claim 8, further recites that the source
16 device includes at least one server device.

18 **Claim 26**, which depends from Clam 8, further recites that the one
19 processed image for the downloadable file group has a ".cim" extension.

20 Independent **Claim 15** is directed towards an apparatus that includes
21 memory and logic. The logic is operatively configured to assign each of a
22 plurality of data files to one of a plurality of specific corresponding downloadable
23 file groups, and for each downloadable file group compress together all assigned
24 data files to form one processed image for the downloadable file group. The logic

1 also associates each resulting processed image with a unique identifier derived
2 therefrom and stores the processed images and a listing of unique identifiers to the
3 memory. The logic is also configured to compare the listing of unique identifiers
4 with a current listing of unique identifiers in a client device to identify processed
5 images that need to be provided to the client device.

6 The exemplary arguments stated above with regard to Claim 1 are also
7 applied herein to Claim 15.

8 **Claim 27**, which depends from Clam 15, further recites that the one
9 processed image for the downloadable file group has a ".cim" extension.
10

11 **Independent Claim 21** is directed towards a system that includes a network,
12 a server device and a client device. The server device is configured to assign each
13 of a plurality of server-based data files to one of a plurality of specific
14 corresponding server-based downloadable file groups, and for each server-based
15 downloadable file group compress together all assigned data files to form one
16 processed image for the server-based downloadable file group. The server device
17 is also configured to associate each resulting processed image with a unique
18 identifier derived therefrom. The server device can also selectively output the
19 processed images and a latest listing of unique identifiers over the network. The
20 client device, which communicates with the server device through the network, is
21 configured to maintain a listing of unique identifiers associated with processed
22 images stored locally within the client device and to compare the listing of unique
23 identifiers with a downloaded latest listing of unique identifiers from the server
24
25

1 device, and selectively download processed images whose unique identifiers
2 appears in the latest listing of unique identifiers from the server device but not in
3 the listing of unique identifiers in client device.

4 The exemplary arguments stated above with regard to Claim 1 are also
5 applied to Claim 21.

6 In **Claim 23**, which also depends from Claim 21, the server device recited
7 as being further configured to selectively assign a plurality of related function data
8 files to one downloadable file group.

9 **Claim 28**, which depends from Clam 25, recites that the one processed
10 image for the server-based downloadable file group has a “.cim” extension.

11 A computer-readable medium is recited in **Claim 29** as having computer-
12 executable instructions for causing at least one processing unit to perform acts that
13 include assigning each of a plurality of data files to one of a plurality of specific
14 corresponding downloadable file groups, for each downloadable file group,
15 compressing together all assigned data files to form one processed image for the
16 downloadable file group, and associating each resulting processed image with a
17 unique identifier derived therefrom. Additional acts include generating a listing of
18 unique identifiers and storing the processed images and the listing of unique
19 identifiers within a source device.

20 Here also, the exemplary arguments stated above with regard to Claim 1 are
21 applicable.

1 **Claim 30**, which depends from **Claim 29**, further recites that the source
2 device includes at least one server device.

3 **Claim 32**, depends from **Claim 29** too, and further states that assigning data
4 files to downloadable file groups further includes assigning a plurality of related
5 function data files to one downloadable file group.

6 **Claim 33** recites that the computer-readable medium of **Claim 29**, further
7 includes sending the processed image and the listing of unique identifiers to a
8 client device.

9

10 **Conclusion**

11 For at least the reasons presented above, the pending claims are clearly
12 patentable over the cited art. It is respectfully requested, therefore, that the
13 rejections be reconsidered and withdrawn and the application be allowed.

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16 Respectfully Submitted,

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18 By: _____

19 Thomas A. Jolly
20 Reg. No. 39,241
21 (303) 539-0365 x248